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Attorneys for Prometheus Energy

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

Case No. BK-S-13-50301 MKN

RODEO CREEK GOLD INC.

Chapter 11

- ☐ Affects this Debtor
☒ Affects all Debtors
☐ Affects Hollister Venture Corporation
☐ Affects Touchstone Resources Company
☐ Affects Antler Peak Gold Inc.

**DECLARATION OF LEN YORK IN
SUPPORT OF OBJECTION TO CURE
AMOUNT**

Date: May 2, 2013

Time: 1:30 p.m.

Debtors.

I, Len York, under penalty of perjury, declare as follows:

1. I am over the age of 18 and am competent to testify to the facts set forth in this declaration and if called as a witness could and would testify thereto.

2. I hold a Bachelor of Science degree in Accounting and Mathematics from the University of Alabama. I am employed by Prometheus Energy ("Prometheus") and serve as the Chief Financial Officer ("CFO"), and am authorized to make this declaration on its behalf.

3. I submit this declaration in support of the Objection To Cure Amount. The facts set forth below are based upon my own personal knowledge or upon my knowledge of the books, records, and files maintained by Prometheus in the ordinary course of business.

4. In my capacity as CFO, I am familiar with the manner in which Prometheus's books and records are prepared and maintained. These books and records are prepared and maintained in the ordinary course of Prometheus's business.

5. The books and records of Prometheus reflect that Rodeo Creek Gold Inc. (the "Debtor") owes the sum of \$800,685.27 to Prometheus for the invoice period marked November

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1 30, 2012 to February 28, 2013. A true and correct copy of the Aging Report is attached hereto as
2 **Exhibit 1.**

3 6. I informed the Debtor that the amount of the stated liability of \$591,055.00 was not
4 correct. The Debtor acknowledged that the amount was not correct and responded by stating that
5 it was missing an invoice. True and correct copies of email correspondence between the Debtor
6 and me is attached hereto as **Exhibit 2.**

7 7. Based upon my correspondence with the Debtor, I believed that the Debtor had
8 corrected its books and records to reflect the correct amount owed to Prometheus.

9 Dated this 12th day of April, 2013.

10
11 /s/ Len York
12 LEN YORK

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EXHIBIT “1”

Rodeo Creek Gold (Hollister Mine)

Aging Date (Trx Date)	Description	Document Type	Document No.	Balance Due	Current	31 - 60 Days	61 - 90 Days	Over 90 Days	
11/30/2012	Invoice SINV-03334	Invoice	LNG-03334	24,173.31	-	-	-	24,173.31	
11/30/2012	Invoice SINV-03360	Invoice	LNG-03360	23,821.64	-	-	-	23,821.64	
12/13/2012	Invoice SINV-03386	Invoice	LNG-03386	48,367.34	-	-	-	48,367.34	
12/21/2012	Invoice SINV-03426	Invoice	LNG-03426	49,363.77	-	-	49,363.77	-	
12/31/2012	Invoice SINV-03450	Invoice	LNG-03450	24,363.14	-	-	24,363.14	-	
12/31/2012	Invoice SINV-03507	Invoice	LNG-03507	86,191.24	-	-	86,191.24	-	
1/15/2013	Invoice SINV-03518	Invoice	LNG-03518	48,883.88	-	-	48,883.88	-	
1/21/2013	Invoice SINV-03533	Invoice	LNG-03533	95,975.10	-	95,975.10	-	-	
1/22/2013	Rodeo Creek Gold Hollister Mine	Payment	RCPT-01271	(0.01)	-	(0.01)	-	-	
1/28/2013	Invoice SINV-03577	Invoice	LNG-03577	35,792.54	-	35,792.54	-	-	
1/30/2013	Rodeo Creek Gold Hollister Mine	Payment	RCPT-01287	(0.01)	-	(0.01)	-	-	
1/31/2013	Invoice SINV-03605	Invoice	LNG-03605	109,200.56	-	109,200.56	-	-	
2/5/2013	Invoice SINV-03647	Invoice	LNG-03647	48,883.88	-	48,883.88	-	-	
2/14/2013	Invoice SINV-03670	Invoice	LNG-03670	44,993.81	-	44,993.81	-	-	
2/19/2013	Rodeo Creek Gold Hollister Mine	Payment	RCPT-01314	(0.01)	(0.01)	-	-	-	
2/26/2013	Invoice SINV-03716	Invoice	LNG-03716	70,309.65	70,309.65	-	-	-	LNG deliveries 2/5 - 2/18/13
2/28/2013	Invoice SINV-03723	Invoice	LNG-03723	90,365.44	90,365.44	-	-	-	
				800,685.27	160,675.08	334,845.87	208,802.03	96,362.29	LNG deliveries 2/10 - 2/21/13

Note-This covers invoices before the prepayment (post bankruptcy)

EXHIBIT “2”

From: Len York <lyork@PrometheusEnergy.com>
Sent: Thursday, March 21, 2013 8:54 AM
To: Dwyer, Jeffrey; Nicole Bourland
Cc: Jeff House; Carolyn Barrett
Subject: Rodeo Creek Aging
Attachments: Copy of Aging as of 3-21-13.xlsx

Jeff/Nicole

All of the court records I've seen have the liability to PEG at \$591,055. Please see the attached aging. There were two Feb. invoice totaling \$160k which were prepetition and it appears a January invoice for around \$49k which must not be in the Rodeo Creek system.

I'd like to get this reconciled and corrected soon. We are also completing a 503b9 analysis which I'll have to you soon and file with the court.

Len York
CFO

PROMETHEUS*energy*

Office: (832)456-6500
Cell: (562)225-8010
Fax: (832)456-0048
Email: lyork@prometheusenergy.com

Rodeo Creek Gold (Hollister Mine)

Aging Date (Trx Date)	Description	Document Type	Document No.	Balance Due	Current	31 - 60 Days	61 - 90 Days	Over 90 Days
11/30/2012	Invoice SINV-03334	Invoice	LNG-03334	24,173.31	-	-	-	24,173.31
11/30/2012	Invoice SINV-03360	Invoice	LNG-03360	23,821.64	-	-	-	23,821.64
12/13/2012	Invoice SINV-03386	Invoice	LNG-03386	48,367.34	-	-	-	48,367.34
12/21/2012	Invoice SINV-03426	Invoice	LNG-03426	49,363.77	-	-	49,363.77	-
12/31/2012	Invoice SINV-03450	Invoice	LNG-03450	24,363.14	-	-	24,363.14	-
12/31/2012	Invoice SINV-03507	Invoice	LNG-03507	86,191.24	-	-	86,191.24	-
1/15/2013	Invoice SINV-03518	Invoice	LNG-03518	48,883.88	-	-	48,883.88	-
1/21/2013	Invoice SINV-03533	Invoice	LNG-03533	95,975.10	-	95,975.10	-	-
1/22/2013	Rodeo Creek Gold Invoice (Hollister Mine)	Payment	RCPT-01271	(0.01)	-	(0.01)	-	-
1/28/2013	Invoice SINV-03577	Invoice	LNG-03577	35,792.54	-	35,792.54	-	-
1/30/2013	Rodeo Creek Gold Invoice (Hollister Mine)	Payment	RCPT-01287	(0.01)	-	(0.01)	-	-
1/31/2013	Invoice SINV-03605	Invoice	LNG-03605	109,200.56	-	109,200.56	-	-
2/5/2013	Invoice SINV-03647	Invoice	LNG-03647	48,883.88	-	48,883.88	-	-
2/14/2013	Invoice SINV-03670	Invoice	LNG-03670	44,993.81	-	44,993.81	-	-
2/19/2013	Rodeo Creek Gold Invoice (Hollister Mine)	Payment	RCPT-01314	(0.01)	(0.01)	-	-	-
2/26/2013	Invoice SINV-03716	Invoice	LNG-03716	70,309.65	70,309.65	-	-	-
2/28/2013	Invoice SINV-03723	Invoice	LNG-03723	90,365.44	90,365.44	-	-	-
				800,685.27	160,675.08	334,845.87	208,802.03	96,362.29
				LNG deliveries 2/10 - 2/24/13				

Note-This covers invoices before the prepayment (post bankruptcy)

From: Nicole Bourland <nicoleb@us.grtbasin.com>
Sent: Thursday, March 21, 2013 1:13 PM
To: Len York
Subject: RE: Rodeo Creek Aging

Len,

Please forward invoice number 03647 – we are missing that. Thank you!



From: Len York [mailto:lyork@PrometheusEnergy.com]
Sent: Thursday, March 21, 2013 8:54 AM
To: Dwyer, Jeffrey; Nicole Bourland
Cc: Jeff House; Carolyn Barrett
Subject: Rodeo Creek Aging

Jeff/Nicole

All of the court records I've seen have the liability to PEG at \$591,055. Please see the attached aging. There were two Feb.. invoice totaling \$160k which were prepetition and it appears a January invoice for around \$49k which must not be in the Rodeo Creek system.

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For further information about Great Basin Gold Limited please see our website at www.grtbasin.com or refer to any Great Basin Gold Limited office.